

**FILED**

FEB 21 2018

CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF ILLINOIS  
EAST ST. LOUIS OFFICE

UNITED STATES OF AMERICA

Plaintiff,

VS.

CHARITY L. KOSTELAC,

Defendant.

Criminal No.

Title 21, U.S.C., Sections 843(a)(3) and 846

**INDICTMENT**

## THE GRAND JURY CHARGES:

**COUNT 1**

## Obtaining a Controlled Substance by Fraud

From on or about May 5, 2017 in St. Clair County, within the Southern District of Illinois,

**CHARITY L. KOSTELAC,**

defendant, did knowingly and intentionally acquire and obtain possession of thirty (30) Percocet tablets containing 5 milligrams of Oxycodone, a Schedule II Controlled Substance, by misrepresentation, fraud, forgery, deception and subterfuge in that defendant presented and had filled a false prescription for the controlled substance at the Schnuck's Pharmacy in Fairview Heights, Illinois in violation of Title 21, United States Code, Section 843(a)(3).

**COUNT 2**

### Obtaining a Controlled Substance by Fraud

From on or about May 8, 2017, in St. Clair County, within the Southern District of Illinois,

**CHARITY L. KOSTELAC,**

defendant, did knowingly and intentionally acquire and obtain possession of thirty

(30) Oxycodone tablets, each containing 5 milligrams of Oxycodone, a Schedule II Controlled Substance, by misrepresentation, fraud, forgery, deception and subterfuge in that defendant presented and had filled a false prescription for the controlled substance at the Wal-Mart Pharmacy in O'Fallon, Illinois, in violation of Title 21, United States Code, Section 843(a)(3).

**COUNT 3**

**Obtaining a Controlled Substance by Fraud**

From on or about May 8, 2017, in St. Clair County, within the Southern District of Illinois,

**CHARITY L. KOSTELAC,**

defendant, did knowingly and intentionally acquire and obtain possession of forty (40) Norco tablets, each containing 7.5 milligrams of Hydrocodone, a Schedule II Controlled Substance, by misrepresentation, fraud, forgery, deception and subterfuge in that defendant presented and had filled a false prescription for the controlled substance at the CVS Pharmacy in O'Fallon, Illinois, in violation of Title 21, United States Code, Section 843(a)(3).

**COUNT 4**

**Obtaining a Controlled Substance by Fraud**

From on or about May 9, 2017, in St. Clair County, within the Southern District of Illinois,

**CHARITY L. KOSTELAC,**

defendant, did knowingly and intentionally acquire and obtain possession of forty (40) Percocet tablets, each containing 5 milligrams of Oxycodone, a Schedule II Controlled Substance, by misrepresentation, fraud, forgery, deception and subterfuge in that defendant presented and had filled a false prescription for

the controlled substance at the Walgreens Pharmacy in Fairview Heights, Illinois, in violation of Title 21, United States Code, Section 843(a)(3).

**COUNT 5**

**Obtaining a Controlled Substance by Fraud**

From on or about May 11, 2017, in St. Clair County, within the Southern District of Illinois,

**CHARITY L. KOSTELAC,**

defendant, did knowingly and intentionally acquire and obtain possession of forty (40) Oxycodone tablets, each containing 5 milligrams of Oxycodone, a Schedule II Controlled Substance, by misrepresentation, fraud, forgery, deception and subterfuge in that defendant presented and had filled a false prescription for the controlled substance at the Shop 'n Save Pharmacy in Belleville, Illinois, in violation of Title 21, United States Code, Section 843(a)(3).

**COUNT 6**

**Obtaining a Controlled Substance by Fraud**

From on or about May 12, 2017, in St. Clair County, within the Southern District of Illinois,

**CHARITY L. KOSTELAC,**

defendant, did knowingly and intentionally acquire and obtain possession of forty (40) Norco tablets, each containing 10 milligrams of Hydrocodone, a Schedule II Controlled Substance, by misrepresentation, fraud, forgery, deception and subterfuge in that defendant presented and had filled a false prescription for the controlled substance at the CVS Pharmacy in O'Fallon, Illinois, in violation of Title 21, United States Code, Section 843(a)(3).



**COUNT 7**

**Obtaining a Controlled Substance by Fraud**

From on or about May 13, 2017, in St. Clair County, within the Southern District of Illinois,

**CHARITY KOSTELAC,**

defendant, did knowingly and intentionally acquire and obtain possession of forty (40) Norco tablets, each containing 10 milligrams of Hydrocodone, a Schedule II Controlled Substance, by misrepresentation, fraud, forgery, deception and subterfuge in that defendant presented and had filled a false prescription for the controlled substance at the Walgreen's Pharmacy in Belleville, Illinois, in violation of Title 21, United States Code, Section 843(a)(3).

**COUNT 8**

**Attempting to Obtain a Controlled Substance by Fraud**

From on or about May 15, 2017, in St. Clair County, within the Southern District of Illinois,

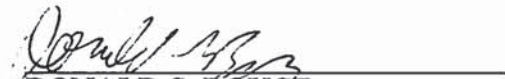
**CHARITY KOSTELAC,**

defendant, did knowingly and intentionally attempt to acquire and obtain possession of forty (40) Oxycodone tablets, each containing 10 milligrams of Oxycodone, a Schedule II Controlled Substance, by misrepresentation, fraud, forgery, deception and subterfuge in that defendant presented a false prescription for the controlled substance at the Walgreen's Pharmacy in Fairview Heights, Illinois, which prescription the pharmacist on duty declined to fill, in violation of Title 21, United States Code, Sections 846 and 843(a)(3).

**A TRUE BILL**



  
MICHAEL J. QUINLEY  
Assistant United States Attorney

  
DONALD S. BOYCE  
United States Attorney

Recommended Bond: \$5,000 unsecured